

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GLOBAL MARINE SYSTEMS LIMITED,

Plaintiff,

v.

TYCO TELECOMMUNICATIONS (U.S.)
INC., TRANSOCEANIC CABLE SHIP CO.
INC.,

Defendants.

Case No.: 05-11605 RGS

**PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR LEAVE
TO FILE FIRST AMENDED ANSWER**

Global Marine Systems Limited ("Global Marine") hereby files this Response to Defendants' Motion for Leave to File First Amended Answer. On April 13, 2006, counsel for the defendants contacted counsel for Global Marine, seeking Global Marine's consent to the Defendant's proposed Motion for Leave to File First Amended Answer. Counsel for Global Marine stated that Global Marine would not be able to give its consent without first having sufficient time to review the proposed amended answer and to confer with its counsel. Global Marine has now completed that review. While Global Marine vigorously contests the additional allegations contained in the proposed amended answer, Global Marine does not intend to file an opposition to the motion.

Respectfully submitted,

GLOBAL MARINE SYSTEMS LIMITED,

By its attorneys,

/s/ Mark S. Freeman

Daniel C. Winston (BBO #562209)

Mark S. Freeman (BBO #636290)

Stacy L. Blasberg (BBO #657420)

CHOATE, HALL & STEWART LLP

Two International Place

Boston, MA 02110

Telephone: (617) 248-5000

Dated: April 28, 2006

Certificate of Service

I hereby certify that this document filed through the ECT system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 28, 2006.

/s/ Mark S. Freeman